

13100

AGENDA



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OU 7 IM/IRA/EA DD Project Team

Wednesday, March 9, 1995
Small West Conference Room
10:00 AM

1. The role of risk assessment in Operable Unit 7 (M.L. Hogg/R. Randall)
 - Focused vs. Full Blown
 - Appropriate Scenarios
 - ARARs screen to trigger presumptive remedies
2. Progress on Closure Strategies (L. J. Peterson-Wright)
 - Waters of the U.S. determination (P. Witherill and L. J. Peterson-Wright)
 - Point of Compliance Update
 - ARARs
3. Update on Groundwater Contamination (S. M. Stoller)
4. Agency Comments (Roundtable)
 - Written Response required?
 - Schedule?
5. Review Old and New Action Items
6. Discussion of Next Agency Interface Meeting Agenda (Roundtable)

Next meetings: March 13, 1995, 10:00, Interlocken-Small West Conference Room
Agency Interface Meeting - TBD

ADMIN RECCRD

BZ-A-000416

1/16

DATE: March 15, 1995
TO: Laurie Peterson-Wright
FROM: Peg Witherill
SUBJECT: Meeting Minutes

Following are DOE comments on the OU7 project meeting minutes transmitted to me on March 10, 1995. These comments are based on my recollection of discussions that took place on March 1. Please provide DOE with an updated version of the minutes. If you disagree with any comments, please feel free to call me and discuss.

Cover Memo

Date of meeting was March 1, 1995 not December 1, 1995.

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DOE Feedback from Agency Interface Meeting

4th Sentence - DOE requested that EG&G recall an informal memorandum from the Administrative Record that inaccurately stated "DOE has decided to invoke dispute on the Pond IM/TRA."

DOE also stated that if EG&G was going to transmit the formal memo stating that DOE stopped work on the February 1, DOE would respond with a memorandum from Jessie Roberson that correctly stated the situation regarding the DOE direction to not proceed without written authorization from DOE.

Status of Issue Paper for Seep Collection PAM

Second ¶ - "EG&G thinks it should be built because the tanks could be used for storing contaminated groundwater after closure."

Comment: DOE's recollection is that *one* EG&G staff person was opposed to the cancellation of the PAM. If this is the EG&G position, then the statement should stand. But due to the fact that there were eight other EG&G staff and support service contractors who stated that there was no technical reason for supporting the PAM, it would seem appropriate to record the opinion of the majority in the minutes.

cc:
Joe Wienand
Ed Mast

March 13, 1995
2510-95/30

Ms. Laurie Peterson-Wright
EG&G Rocky Flats, Inc.
P.O. Box 464, Bldg. 080
Golden, Colorado 80402-0464

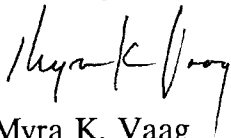
Subject: Submittal of March 8, 1995 Meeting Minutes
Technical Working Group Meeting for Operable Unit No. 7
(MTS Contract 353017TB3)

Dear Ms. Peterson-Wright:

Enclosed are meeting minutes to document the March 8, 1995, technical working group meeting for the OU 7 landfill closure interim measure/interim remedial action and environmental assessment.

If you have any questions, please contact me at your convenience.

Sincerely,



Myra K. Vaag
Project Manager

Enclosure

cc:	W. Bartholomew w/o	EG&G	B. Caruso	Stoller
	R. Cygnarowicz	EG&G	A. Crockett	Stoller
	T. Lindsay	EG&G	M. Eisenbeis	Stoller
	P. Martin	EG&G	K. Fiebeg	Stoller
	P. Corser	TerraMatrix	S. Franklin	Stoller
	J. Kendall	TerraMatrix	C. Gee	Stoller
			J. Jankousky	Stoller
			D. Palmer	Stoller
			L. Ross w/o	Stoller
			B. Stephanus w/o	Stoller
			OU7 Project File	
			MKV Chron	

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Minutes for the OU 7 Seep Collection/Landfill Closure IM/IRA
Technical Working Group Meeting
March 8, 1995

The following topics were discussed:

The Role of Risk Assessment in OU 7

EG&G risk assessment staff reviewed the draft human health risk assessment for residential ingestion of groundwater at OU 7. They agreed that contaminants in the lower hydrostratigraphic unit (LHSU) pose no risk to human health and should not be investigated further. Contaminants in the upper hydrostratigraphic unit (UHSU) do pose a risk to human health, and additional investigation is warranted.

EG&G recommended using the Gilbert methodology for background comparisons to identify potential contaminants of concern (PCOCs) and using a 95% upper confidence limit (UCL) for programmatic preliminary remediation goal (PPRG) comparisons and the risk assessment. The risk assessment for leachate at the seep should also be redone using a 95% UCL. Both of these would be considered "focused risk assessments" performed to determine if treatment of groundwater and leachate is necessary. Stoller will look at the groundwater data set to determine how data will be aggregated for the Gilbert statistical comparisons. Stoller and EG&G groundwater modelers will determine if the groundwater is at equilibrium with respect to the leachate plume.

EG&G risk assessment staff also suggested that an ecological benchmark screen of the seep water, pond water, and pond sediments be performed by EG&G or by Stoller.

Progress on Closure Strategies (Landfill Closure IM/IRA/EA)

The presumptive remedy implies control at the downgradient end of the landfill. EG&G has interpreted that the leachate is leachate "contained in" groundwater. The existing leachate seep will be covered by the landfill cap and therefore will be addressed as groundwater downgradient of the landfill. Surface water in the pond poses no risk to human health and does not have to be addressed unless it poses a risk to biota as determined by the ecological benchmark screen.

Waters of the U.S. (W.U.S.) Determination - EG&G has interpreted that the East Landfill Pond is not W.U.S. according to the regulations. It is a wholly manmade structure built to contain leachate from the landfill and has no permitted discharge. The pond is in a drainage that is W.U.S. The implications of this interpretation if the pond is left in place after closure include managing the water for 30 years and obtaining a discharge permit. The pond may have to be incorporated into the Site Record of Decision. If the pond is left in place as a wetlands, a lined holding pond would be required to sample water before discharge. If the pond is replaced or removed, wetlands mitigation and Preble's mouse habitat mitigation would have to be included as part of the action. If the pond sediments pose no risk to human health, they could be left in place or could be consolidated under the landfill cap. A wetlands assessment would be performed and attached to the IM/IRA/EA DD, and a Notice of Intent would be published in the Federal Register.

Point of Compliance Update - The leading edge of the plume is the point of compliance for ARARs. The point of compliance for the remedy is site specific based on technology considerations.

Applicable or Relevant and Appropriate Requirements (ARARs) - A brainstorming session ensued regarding how to determine if treatment of groundwater is necessary. The attached flow chart summarizes the OU 7 strategy for making this determination.

Update on Groundwater Contamination

This discussion was postponed to another meeting.

Agency Comments

Stoller will prepare written responses to EPA's comments on the February 22, 1995, OU 7 Landfill Closure IM/IRA update meeting and submit them to EG&G by March 22.

Agency Interface Meeting

The next agency interface meeting has not been scheduled. DOE and EG&G plan to present the closure strategy for OU 7.

Action Items

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| 01-186 | Completed. |
| 187 | Determine if a small French drain would decrease head buildup in groundwater west of the landfill using the existing groundwater model (J. Jankousky, Stoller). In progress. |
| 188-199 | Completed. |
| 200 | Determine if the East Landfill Pond is considered "Waters of the U.S." (L. Peterson-Wright, EG&G). EG&G's position is that the East Landfill Pond is not W.U.S. It is a wholly manmade structure built to contain leachate from the landfill in a drainage that is W.U.S. and has no permitted discharge. Completed. |
| 201 | Resolve issue for seep water; is it "F039" or "F039 contained in?" (L. Peterson-Wright, EG&G). EG&G's position is that the seep water is "F039 contained in" groundwater because clean groundwater is entering the landfill on the north side and mixing with leachate. Completed. |
| 202 | Research implications of extending the IHSS 114 boundary to include all of OU 7 (L. Peterson-Wright, EG&G). In progress. |
| 203 | Bring an EG&G risk assessment person into the OU 7 working group (L. Peterson-Wright, EG&G). Mary Lee Hogg and Rotha Randall have reviewed the preliminary risk assessment for groundwater and will be available as needed. Completed. |
| 204 | Completed. |
| 205 | Perform a risk assessment on groundwater downgradient of the dam (K. Crute, Stoller). A preliminary risk assessment was performed. Based on comments from the EG&G risk assessment staff, Stoller will redo the background comparisons using the Gilbert methodology and use a 95% UCL for the focused risk assessment. In progress. |
| 206 | Conduct an ecological benchmark screen (M. Vaag, Stoller). Stoller has the resources necessary to perform the screen. In progress. |
| 207 | Compile a list of ARARs for groundwater (S. Franklin, Stoller). |

- 208 Assist EG&G in preparing the OU 7 closure strategy paper for the next agency meeting (M. Vaag, Stoller).
- 209 Prepare written responses to EPA's comments on the OU 7 Landfill Closure IM/IRA update meeting and submit them to EG&G by March 22 (M. Eisenbeis, Stoller).

Next Meeting

The next meeting will be at 10:00 a.m. on March 15, 1995, in the EG&G small west conference room.

List of Attendees

Name	Organization	Phone
Brian Caruso	Stoller	546-4338
Kelley Crute	Stoller	546-4440
Mary Lee Hogg	ICF Kaiser/EG&G	966-8716
Tom Lindsay	EG&G	966-6985
Peter Martin	EG&G	966-8695
Laurie Peterson-Wright	EG&G Project Manager	966-8553
Rotha Randall	EG&G	966-6924
Myra Vaag	Stoller Project Manager	546-4417